IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

RAH COLOR TECHNOLOGIES LLC, Plaintiff, vs. RICOH AMERICAS CORPORATION, Defendant.	Civil Action No. 2:15-05203 Jury Trial Demanded

DEFENDANT'S AMENDED ANSWER, AFFIRMATIVE DEFENSES, AND COUNTERCLAIMS

Defendant Ricoh Americas Corporation ("RAC") hereby amends its response to the Complaint of Plaintiff RAH Color Technologies LLC ("RAH") in accordance with the numbered paragraphs thereof, as set forth below. To the extent the unnumbered headings in the Complaint contain allegations supporting RAH's claims, they are denied. Unless specifically admitted below, RAC denies each and every allegations in the Complaint.

THE PARTIES

1. RAC admits that RAH purports to be a limited liability company organized under the laws of the Commonwealth of Virginia and maintains an office at 7012 Colgate Drive, Alexandria, Virginia 22307. RAC lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of Paragraph 1, and therefore denies them.

2. RAC admits that, prior to April 1, 2016, it was a corporation with a principal place of business at 70 Valley Stream Parkway, Malvern, Pennsylvania 19355. As of April 1, 2016, RAC merged with its parent company, Ricoh USA Inc., and RAC no longer exists as a

separate entity. For simplicity, however, this Answer refers to Ricoh USA Inc. as "RAC." RAC denies the remaining allegations of Paragraph 2

JURISDICTION AND VENUE

3. Paragraph 3 of the Complaint states a legal conclusion that does not require a response.

4. Paragraph 4 of the Complaint states a legal conclusion that does not require a response. To the extent a response is required, RAC denies the allegations of Paragraph 4 of the Complaint.

5. Paragraph 5 of the Complaint states a legal conclusion that does not require a response. To the extent a response is required, RAC denies the allegations of Paragraph 5 of the Complaint.

6. Paragraph 6 of the Complaint states a legal conclusion that does not require a response. To the extent a response is required, RAC denies the allegations of Paragraph 6 of the Complaint.

BACKGROUND FACTS REGARDING RAH COLOR TECHNOLOGIES

7. RAC lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 7 of the Complaint, and therefore denies them.

8. RAC lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 8 of the Complaint, and therefore denies them.

9. RAC lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 9 of the Complaint, and therefore denies them.

10. RAC lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 10 of the Complaint, and therefore denies them.

11. RAC lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 11 of the Complaint, and therefore denies them.

12. RAC lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 12 of the Complaint, and therefore denies them.

13. RAC lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 13 of the Complaint, and therefore denies them.

14. RAC lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 14 of the Complaint, and therefore denies them.

15. RAC lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 15 of the Complaint, and therefore denies them.

BACKGROUND FACTS REGARDING THE RAH COLOR TECHNOLOGIES PATENT PORTFOLIO

16. RAC admits that the U.S. Patent Office has issued the following patents: U.S. Patent Nos. 6,995,870; 7,280,251; 7,312,897; 7,729,008; 7,830,546; 8,416,444; 8,760,704; and 8,817,314 (the "Asserted Patents"). RAC lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of Paragraph 16 of the Complaint, and therefore denies them.

17. RAC lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 17 of the Complaint, and therefore denies them.

18. RAC lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 18 of the Complaint, and therefore denies them.

19. RAC lacks knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 19 of the Complaint, and therefore denies them.

RICOH'S AWARENESS OF THE PATENTS-IN-SUIT

20. RAC admits that it received a letter dated October 20, 2014 from counsel for RAH. RAC denies the remaining allegations of Paragraph 20 of the Complaint.

21. RAC denies the allegations of Paragraph 21 of the Complaint.

PRODUCTS AT ISSUE

22. RAC denies the allegations of Paragraph 22 of the Complaint.

FIRST CLAIM FOR RELIEF
(Infringement of the '870 Patent)

23. RAC incorporates by reference its responses set forth in Paragraphs 1-22 of the Answer as if fully set forth herein.

24. RAC denies the allegations of Paragraph 24 of the Complaint.

25. RAC denies the allegations of Paragraph 25 of the Complaint.

26. RAC denies the allegations of Paragraph 26 of the Complaint.

27. RAC denies the allegations of Paragraph 27 of the Complaint.

28. RAC denies the allegations of Paragraph 28 of the Complaint.

29. RAC denies the allegations of Paragraph 29 of the Complaint.

30. RAC denies the allegations of Paragraph 30 of the Complaint.

31. RAC denies the allegations of Paragraph 31 of the Complaint.

32. RAC denies the allegations of Paragraph 32 of the Complaint.

SECOND CLAIM FOR RELIEF
(Infringement of the ’251 Patent)

33. RAC incorporates by reference its responses set forth in Paragraphs 1-22 of the Answer as if fully set forth herein.

34. RAC denies the allegations of Paragraph 34 of the Complaint.

35. RAC denies the allegations of Paragraph 35 of the Complaint.

36. RAC denies the allegations of Paragraph 36 of the Complaint.

37. RAC denies the allegations of Paragraph 37 of the Complaint.

38. RAC denies the allegations of Paragraph 38 of the Complaint.

39. RAC denies the allegations of Paragraph 39 of the Complaint.

40. RAC denies the allegations of Paragraph 40 of the Complaint.

41. RAC denies the allegations of Paragraph 41 of the Complaint.

42. RAC denies the allegations of Paragraph 42 of the Complaint.

THIRD CLAIM FOR RELIEF
(Infringement of the ’897 Patent)

43. RAC incorporates by reference its responses set forth in Paragraphs 1-22 of the Answer as if fully set forth herein.

44. RAC denies the allegations of Paragraph 44 of the Complaint.

45. RAC denies the allegations of Paragraph 45 of the Complaint.

46. RAC denies the allegations of Paragraph 46 of the Complaint.

47. RAC denies the allegations of Paragraph 47 of the Complaint.

48. RAC denies the allegations of Paragraph 48 of the Complaint.

49. RAC denies the allegations of Paragraph 49 of the Complaint.

50. RAC denies the allegations of Paragraph 50 of the Complaint.

51. RAC denies the allegations of Paragraph 51 of the Complaint.

52. RAC denies the allegations of Paragraph 52 of the Complaint.

FOURTH CLAIM FOR RELIEF
(Infringement of the ’008 Patent)

53. RAC incorporates by reference its responses set forth in Paragraphs 1-22 of the Answer as if fully set forth herein.

54. RAC denies the allegations of Paragraph 54 of the Complaint.

55. RAC denies the allegations of Paragraph 55 of the Complaint.

56. RAC denies the allegations of Paragraph 56 of the Complaint.

57. RAC denies the allegations of Paragraph 57 of the Complaint.

58. RAC denies the allegations of Paragraph 58 of the Complaint.

59. RAC denies the allegations of Paragraph 59 of the Complaint.

60. RAC denies the allegations of Paragraph 60 of the Complaint.

61. RAC denies the allegations of Paragraph 61 of the Complaint.

62. RAC denies the allegations of Paragraph 62 of the Complaint.

FIFTH CLAIM FOR RELIEF
(Infringement of the ’546 Patent)

63. RAC incorporates by reference its responses set forth in Paragraphs 1-22 of the Answer as if fully set forth herein.

64. RAC denies the allegations of Paragraph 64 of the Complaint.

65. RAC denies the allegations of Paragraph 65 of the Complaint.

66. RAC denies the allegations of Paragraph 66 of the Complaint.

67. RAC denies the allegations of Paragraph 67 of the Complaint.

68. RAC denies the allegations of Paragraph 68 of the Complaint.

SIXTH CLAIM FOR RELIEF
(Infringement of the ’444 Patent)

69. RAC incorporates by reference its responses set forth in Paragraphs 1-22 of the Answer as if fully set forth herein.

70. RAC denies the allegations of Paragraph 70 of the Complaint.

71. RAC denies the allegations of Paragraph 71 of the Complaint.

72. RAC denies the allegations of Paragraph 72 of the Complaint.

73. RAC denies the allegations of Paragraph 73 of the Complaint.

74. RAC denies the allegations of Paragraph 74 of the Complaint.

75. RAC denies the allegations of Paragraph 75 of the Complaint.

76. RAC denies the allegations of Paragraph 76 of the Complaint.

77. RAC denies the allegations of Paragraph 77 of the Complaint.

78. RAC denies the allegations of Paragraph 78 of the Complaint.

SEVENTH CLAIM FOR RELIEF
(Infringement of the ’704 Patent)

79. RAC incorporates by reference its responses set forth in Paragraphs 1-22 of the Answer as if fully set forth herein.

80. RAC denies the allegations of Paragraph 80 of the Complaint.

81. RAC denies the allegations of Paragraph 81 of the Complaint.

82. RAC denies the allegations of Paragraph 82 of the Complaint.

83. RAC denies the allegations of Paragraph 83 of the Complaint.

84. RAC denies the allegations of Paragraph 84 of the Complaint.

85. RAC denies the allegations of Paragraph 85 of the Complaint.

86. RAC denies the allegations of Paragraph 86 of the Complaint.

87. RAC denies the allegations of Paragraph 87 of the Complaint.

88. RAC denies the allegations of Paragraph 88 of the Complaint.

EIGHTH CLAIM FOR RELIEF
(Infringement of the ’314 Patent)

89. RAC incorporates by reference its responses set forth in Paragraphs 1-22 of the Answer as if fully set forth herein.

90. RAC denies the allegations of Paragraph 90 of the Complaint.

91. RAC denies the allegations of Paragraph 91 of the Complaint.

92. RAC denies the allegations of Paragraph 92 of the Complaint.

93. RAC denies the allegations of Paragraph 93 of the Complaint.

94. RAC denies the allegations of Paragraph 94 of the Complaint.

95. RAC denies the allegations of Paragraph 95 of the Complaint.

96. RAC denies the allegations of Paragraph 96 of the Complaint.

97. RAC denies the allegations of Paragraph 97 of the Complaint.

98. RAC denies the allegations of Paragraph 98 of the Complaint.

AFFIRMATIVE DEFENSES

RAC asserts the following affirmative defenses to RAH’s Complaint without assuming any burden of proof that it would not otherwise have:

FIRST DEFENSE
(Failure to State a Claim)

RAH’s Complaint and each claim for relief therein fail to state a claim upon which relief can be granted.

SECOND DEFENSE
(Non-Infringement)

RAC has not infringed and does not infringe, either directly, indirectly, contributorily, or by inducement, any valid and enforceable claims of the Asserted Patents either literally or under the doctrine of equivalents, willfully, or otherwise.

THIRD DEFENSE
(Invalidity)

The claims of the Asserted Patents are invalid for failure to satisfy one or more of the conditions for patentability specified in Title 35 of the United States Code, including but not limited to §§ 101, 102, 103, 112, and 132.

FOURTH DEFENSE
(Prosecution History Estoppel, Prosecution Disclaimer, Judicial Estoppel)

RAH is estopped from construing the claims of the Asserted Patents in such a way as to cover RAC's activities because of RAH's prior conduct; RAH or the applicant's amendment, cancellation, or abandonment of claims before the U.S. Patent Office; RAH or the applicant's admissions or other statements made to the U.S. Patent Office; RAH's prior statements made in or to this Court or any other court; and/or prior rulings by this Court or any other court.

FIFTH DEFENSE
(License)

Upon information and belief, RAC has an express and/or implied license to the Asserted Patents as a result of prior licenses to the Asserted Patents granted by RAH to third parties.

Upon further information and belief, to the extent RAH's infringement contentions in its Complaint are based in whole or in part on the allegation that the Asserted Patents are essential to the International Color Consortium ("ICC") standard or any other standard and that RAC's products are operable or have been incorporated into products operable according to certain standards set forth by the ICC or other standards organizations, RAC has an irrevocable right to a license under the Asserted Patents on a non-discriminatory basis on reasonable terms and conditions .

SIXTH DEFENSE
(Equitable Defenses)

All or some of RAH's claims for relief are barred, in whole or in part, by the doctrines of waiver, implied waiver, laches, prosecution history laches, equitable estoppel, and/or other equitable remedies.

SEVENTH DEFENSE
(Limitation on Damages Due to Failure to Mark)

In its Complaint, RAH alleges that RAC infringes certain apparatus claims in the following Asserted Patents: U.S. Patent Nos. 6,995,870; 7,312,897; 7,729,008; 7,830,546; 8,416,444; 8,760,704; and 8,817,314. In addition, U.S. Patent No. 7,280,251 contains both apparatus and method claims. RAH and/or RAH's licensees, however, have failed to mark articles allegedly practicing the inventions claimed in the Asserted Patents. Accordingly, RAH's claims for damages for alleged infringement of the Asserted Patents are limited under 35 U.S.C. § 287.

EIGHTH DEFENSE
(Time Limitation on Damages)

To the extent RAH is entitled to recover damages for alleged infringement of one or more of the Asserted Patents occurring prior to the filing of RAH's Complaint, RAH may not recover damages for any such alleged infringement committed more than six years prior to the filing of the Complaint under 35 U.S.C. § 286.

NINTH DEFENSE
(Limitation on Costs Due to Invalidity)

To the extent any claim of the Asserted Patents is found invalid, RAH is precluded from recovering costs under 35 U.S.C. § 288.

TENTH DEFENSE
(No Injunctive Relief)

RAH is not entitled to injunctive relief because any alleged injury to RAH is not immediate or irreparable and because RAH has an adequate remedy at law, if any remedy is appropriate.

RESERVATION OF ADDITIONAL DEFENSES

In addition to the defenses described above, RAC reserves all defenses under Rule 8(c) of the Federal Rules of Civil Procedure, the patent laws of the United States, and any other defenses, at law or equity, which may now exist or in the future may be available based on discovery and further factual investigation in this case.

PRAYER FOR RELIEF

RAC hereby incorporates by reference its responses to all paragraphs in RAH's Complaint as if fully set forth herein. RAC denies that RAH is entitled to any of the relief set forth in the Prayer for Relief in the Complaint or any other relief.

WHEREFORE, RAC prays for relief as follows:

A. That the Court enter judgment in favor of RAC and against RAH;

B. That the Court dismiss RAH's Complaint and the claims therein, with prejudice;

C. That the Court order RAH to pay RAC's attorneys' fees and costs pursuant to 35 U.S.C. § 285 and/or other applicable authority; and

D. That the Court grant RAC such other and further relief as it may deem just and equitable.

JURY DEMAND

RAC demands a jury trial on all issues that may be so tried.

COUNTERCLAIMS

RAC asserts counterclaims against RAH as follows:

NATURE AND BASIS OF ACTION

1. This action is one seeking declaratory judgments of non-infringement and invalidity.

PARTIES

2. Counterclaimant Ricoh Americas Corporation ("RAC") was a Delaware corporation that maintained its principal place of business at 70 Valley Stream Parkway, Malvern, Pennsylvania 19355. As of April 1, 2016, RAC merged with its parent company, Ricoh USA Inc., and RAC no longer exists as a separate entity. Ricoh USA Inc., the real party in interest going forward, is an Ohio corporation that maintains its principal place of business at 70 Valley Stream Parkway, Malvern, Pennsylvania 19355. For simplicity, however, these Counterclaims refer to Ricoh USA Inc. as "RAC."

3. According to the allegations set forth in Paragraph 1 of RAH Color Technologies' ("RAH's") Complaint, Counterclaim Defendant RAH is a limited liability company organized

under the laws of the Commonwealth of Virginia and maintains an office at 7012 Colgate Drive, Alexandria, Virginia 22307.

JURISDICTION AND VENUE

4. This action arises under the patent laws of the United States, 35 U.S.C. § 1, *et seq.*, and the Federal Declaratory Judgment Act, 28 U.S.C. §§ 2201 and 2202.

5. This Court has subject matter jurisdiction pursuant to, without limitation, 28 U.S.C. §§ 1331, 1338, 2201, and 2202.

6. RAH has submitted to the personal jurisdiction of this Court by bringing the present action.

7. Venue is appropriate in this District pursuant to 28 U.S.C. §§ 1367 and 1391.

GENERAL ALLEGATIONS

8. In its Complaint, RAH purports to be the owner of all rights and interest in the Asserted Patents.

9. In its Complaint, RAH alleges that RAC has infringed and continues to infringe the Asserted Patents. As set forth in its Answer above, RAC denies that it infringes any valid and enforceable claims of the Asserted Patents.

10. Accordingly, there is an actual and justifiable controversy between the parties arising under the Patent Act, 35 U.S.C. § 1, *et seq.*, and that controversy is ripe for adjudication by this Court.

FIRST COUNTERCLAIM
(Declaratory Judgment of Non-Infringement of U.S. Patent No. 6,995,870)

11. RAC realleges and incorporates by reference Paragraphs 1 through 10, inclusive, of its Counterclaims as though fully set forth herein.

12. RAC has not infringed and does not infringe, either directly, indirectly, contributory, or by inducement, any valid and enforceable claims of the ’870 patent either literally or under the doctrine of equivalents, willfully, or otherwise.

13. To resolve the legal and factual questions raised by RAH, and to afford relief from the uncertainty and controversy arising from RAH’s Complaint, RAC is entitled to declaratory judgment that it has not infringed and does not infringe, either directly, indirectly, contributorily, or by inducement, any valid and enforceable claims of the ’870 patent either literally or under the doctrine of equivalents.

SECOND COUNTERCLAIM
(Declaratory Judgment of Non-Infringement of U.S. Patent No. 7,280,251)

14. RAC realleges and incorporates by reference Paragraphs 1 through 10, inclusive, of its Counterclaims as though fully set forth herein.

15. RAC has not infringed and does not infringe, either directly, indirectly, contributory, or by inducement, any valid and enforceable claims of the ’251 patent either literally or under the doctrine of equivalents, willfully, or otherwise.

16. To resolve the legal and factual questions raised by RAH, and to afford relief from the uncertainty and controversy arising from RAH’s Complaint, RAC is entitled to declaratory judgment that it has not infringed and does not infringe, either directly, indirectly, contributorily, or by inducement, any valid and enforceable claims of the ’251 patent either literally or under the doctrine of equivalents.

THIRD COUNTERCLAIM
(Declaratory Judgment of Non-Infringement of U.S. Patent No. 7,312,897)

17. RAC realleges and incorporates by reference Paragraphs 1 through 10, inclusive, of its Counterclaims as though fully set forth herein.

18. RAC has not infringed and does not infringe, either directly, indirectly, contributory, or by inducement, any valid and enforceable claims of the ’897 patent either literally or under the doctrine of equivalents, willfully, or otherwise.

19. To resolve the legal and factual questions raised by RAH, and to afford relief from the uncertainty and controversy arising from RAH’s Complaint, RAC is entitled to declaratory judgment that it has not infringed and does not infringe, either directly, indirectly, contributorily, or by inducement, any valid and enforceable claims of the ’897 patent either literally or under the doctrine of equivalents.

FOURTH COUNTERCLAIM
(Declaratory Judgment of Non-Infringement of U.S. Patent No. 7,729,008)

20. RAC realleges and incorporates by reference Paragraphs 1 through 10, inclusive, of its Counterclaims as though fully set forth herein.

21. RAC has not infringed and does not infringe, either directly, indirectly, contributory, or by inducement, any valid and enforceable claims of the ’008 patent either literally or under the doctrine of equivalents, willfully, or otherwise.

22. To resolve the legal and factual questions raised by RAH, and to afford relief from the uncertainty and controversy arising from RAH’s Complaint, RAC is entitled to declaratory judgment that it has not infringed and does not infringe, either directly, indirectly, contributorily, or by inducement, any valid and enforceable claims of the ’008 patent either literally or under the doctrine of equivalents.

FIFTH COUNTERCLAIM
(Declaratory Judgment of Non-Infringement of U.S. Patent No. 7,830,546)

23. RAC realleges and incorporates by reference Paragraphs 1 through 10, inclusive, of its Counterclaims as though fully set forth herein.

24. RAC has not infringed and does not infringe, either directly, indirectly, contributory, or by inducement, any valid and enforceable claims of the ’546 patent either literally or under the doctrine of equivalents, willfully, or otherwise.

25. To resolve the legal and factual questions raised by RAH, and to afford relief from the uncertainty and controversy arising from RAH’s Complaint, RAC is entitled to declaratory judgment that it has not infringed and does not infringe, either directly, indirectly, contributorily, or by inducement, any valid and enforceable claims of the ’546 patent either literally or under the doctrine of equivalents.

SIXTH COUNTERCLAIM
(Declaratory Judgment of Non-Infringement of U.S. Patent No. 8,416,444)

26. RAC realleges and incorporates by reference Paragraphs 1 through 10, inclusive, of its Counterclaims as though fully set forth herein.

27. RAC has not infringed and does not infringe, either directly, indirectly, contributory, or by inducement, any valid and enforceable claims of the ’444 patent either literally or under the doctrine of equivalents, willfully, or otherwise.

28. To resolve the legal and factual questions raised by RAH, and to afford relief from the uncertainty and controversy arising from RAH’s Complaint, RAC is entitled to declaratory judgment that it has not infringed and does not infringe, either directly, indirectly, contributorily, or by inducement, any valid and enforceable claims of the ’444 patent either literally or under the doctrine of equivalents.

SEVENTH COUNTERCLAIM
(Declaratory Judgment of Non-Infringement of U.S. Patent No. 8,760,704)

29. RAC realleges and incorporates by reference Paragraphs 1 through 10, inclusive, of its Counterclaims as though fully set forth herein.

30. RAC has not infringed and does not infringe, either directly, indirectly, contributory, or by inducement, any valid and enforceable claims of the ’704 patent either literally or under the doctrine of equivalents, willfully, or otherwise.

31. To resolve the legal and factual questions raised by RAH, and to afford relief from the uncertainty and controversy arising from RAH’s Complaint, RAC is entitled to declaratory judgment that it has not infringed and does not infringe, either directly, indirectly, contributorily, or by inducement, any valid and enforceable claims of the ’704 patent either literally or under the doctrine of equivalents.

EIGHTH COUNTERCLAIM
(Declaratory Judgment of Non-Infringement of U.S. Patent No. 8,817,314)

32. RAC realleges and incorporates by reference Paragraphs 1 through 10, inclusive, of its Counterclaims as though fully set forth herein.

33. RAC has not infringed and does not infringe, either directly, indirectly, contributory, or by inducement, any valid and enforceable claims of the ’314 patent either literally or under the doctrine of equivalents, willfully, or otherwise.

34. To resolve the legal and factual questions raised by RAH, and to afford relief from the uncertainty and controversy arising from RAH’s Complaint, RAC is entitled to declaratory judgment that it has not infringed and does not infringe, either directly, indirectly, contributorily, or by inducement, any valid and enforceable claims of the ’314 patent either literally or under the doctrine of equivalents.

NINTH COUNTERCLAIM
(Declaratory Judgment of Invalidity of U.S. Patent No. 6,995,870)

35. RAC realleges and incorporates by reference Paragraphs 1 through 10, inclusive, of its Counterclaims as though fully set forth herein.

36. The claims of the ’870 patent are invalid for failure to satisfy one or more of the conditions for patentability specified in Title 35 of the United States Code, including but not limited to §§ 101, 102, 103, 112, and 132.

37. To resolve the legal and factual questions raised by RAH, and to afford relief from the uncertainty and controversy arising from RAH’s Complaint, RAC is entitled to declaratory judgment that the claims of the ’870 patent are invalid.

TENTH COUNTERCLAIM
(Declaratory Judgment of Invalidity of U.S. Patent No. 7,280,251)

38. RAC realleges and incorporates by reference Paragraphs 1 through 10, inclusive, of its Counterclaims as though fully set forth herein.

39. The claims of the ’251 patent are invalid for failure to satisfy one or more of the conditions for patentability specified in Title 35 of the United States Code, including but not limited to §§ 101, 102, 103, 112, and 132.

40. To resolve the legal and factual questions raised by RAH, and to afford relief from the uncertainty and controversy arising from RAH’s Complaint, RAC is entitled to declaratory judgment that the claims of the ’251 patent are invalid.

ELEVENTH COUNTERCLAIM
(Declaratory Judgment of Invalidity of U.S. Patent No. 7,312,897)

41. RAC realleges and incorporates by reference Paragraphs 1 through 10, inclusive, of its Counterclaims as though fully set forth herein.

42. The claims of the ’897 patent are invalid for failure to satisfy one or more of the conditions for patentability specified in Title 35 of the United States Code, including but not limited to §§ 101, 102, 103, 112, and 132.

43. To resolve the legal and factual questions raised by RAH, and to afford relief from the uncertainty and controversy arising from RAH's Complaint, RAC is entitled to declaratory judgment that the claims of the '897 patent are invalid.

TWELFTH COUNTERCLAIM
(Declaratory Judgment of Invalidity of U.S. Patent No. 7,729,008)

44. RAC realleges and incorporates by reference Paragraphs 1 through 10, inclusive, of its Counterclaims as though fully set forth herein.

45. The claims of the '008 patent are invalid for failure to satisfy one or more of the conditions for patentability specified in Title 35 of the United States Code, including but not limited to §§ 101, 102, 103, 112, and 132.

46. To resolve the legal and factual questions raised by RAH, and to afford relief from the uncertainty and controversy arising from RAH's Complaint, RAC is entitled to declaratory judgment that the claims of the '008 patent are invalid.

THIRTEENTH COUNTERCLAIM
(Declaratory Judgment of Invalidity of U.S. Patent No. 7,830,546)

47. RAC realleges and incorporates by reference Paragraphs 1 through 10, inclusive, of its Counterclaims as though fully set forth herein.

48. The claims of the '546 patent are invalid for failure to satisfy one or more of the conditions for patentability specified in Title 35 of the United States Code, including but not limited to §§ 101, 102, 103, 112, and 132.

49. To resolve the legal and factual questions raised by RAH, and to afford relief from the uncertainty and controversy arising from RAH's Complaint, RAC is entitled to declaratory judgment that the claims of the '546 patent are invalid.

FOURTEENTH COUNTERCLAIM
(Declaratory Judgment of Invalidity of U.S. Patent No. 8,416,444)

50. RAC realleges and incorporates by reference Paragraphs 1 through 10, inclusive, of its Counterclaims as though fully set forth herein.

51. The claims of the ’444 patent are invalid for failure to satisfy one or more of the conditions for patentability specified in Title 35 of the United States Code, including but not limited to §§ 101, 102, 103, 112, and 132.

52. To resolve the legal and factual questions raised by RAH, and to afford relief from the uncertainty and controversy arising from RAH’s Complaint, RAC is entitled to declaratory judgment that the claims of the ’444 patent are invalid.

FIFTEENTH COUNTERCLAIM
(Declaratory Judgment of Invalidity of U.S. Patent No. 8,760,704)

53. RAC realleges and incorporates by reference Paragraphs 1 through 10, inclusive, of its Counterclaims as though fully set forth herein.

54. The claims of the ’704 patent are invalid for failure to satisfy one or more of the conditions for patentability specified in Title 35 of the United States Code, including but not limited to §§ 101, 102, 103, 112, and 132.

55. To resolve the legal and factual questions raised by RAH, and to afford relief from the uncertainty and controversy arising from RAH’s Complaint, RAC is entitled to declaratory judgment that the claims of the ’704 patent are invalid.

SIXTEENTH COUNTERCLAIM
(Declaratory Judgment of Invalidity of U.S. Patent No. 8,817,314)

56. RAC realleges and incorporates by reference Paragraphs 1 through 10, inclusive, of its Counterclaims as though fully set forth herein.

57. The claims of the ’314 patent are invalid for failure to satisfy one or more of the conditions for patentability specified in Title 35 of the United States Code, including but not limited to §§ 101, 102, 103, 112, and 132.

58. To resolve the legal and factual questions raised by RAH, and to afford relief from the uncertainty and controversy arising from RAH’s Complaint, RAC is entitled to declaratory judgment that the claims of the ’314 patent are invalid.

PRAYER FOR RELIEF

WHEREFORE, RAC prays for relief as follows:

A. For a declaration that RAC does not infringe, either directly, indirectly, contributorily, or by inducement, any valid and enforceable claim of the Asserted Patents, either literally or under the doctrine of equivalents, willfully, or otherwise;

B. For a declaration that the claims of the Asserted Patents are invalid;

C. For a declaration that this is an exceptional case, and for an award to RAC of its attorneys’ fees and costs pursuant to 35 U.S.C. § 285 and/or other applicable authority;

D. For such other relief as this Court deems just and proper.

JURY DEMAND

59. RAC demands trial by jury on all issues that may be so tried.

HANGLEY ARONCHICK SEGAL PUDLIN & SCHILLER

Dated: April 7, 2016 By: /s/ *William T. Hangley*

William T. Hangley
Rebecca S. Melley
Jason A. Levine
One Logan Square, 27th Floor
Philadelphia, PA 19103
(215) 568-6200

QUINN EMANUEL URQUHART & SULLIVAN, LLP

David Eiseman (admitted *pro hac vice*)
50 California Street, 22nd Floor
San Francisco, CA 94111
Telephone: (415) 875-6600

Ryan S. Goldstein (admitted *pro hac vice*)
Robert S. Hill (admitted *pro hac vice*)
865 S. Figueroa St. 10th Floor
Los Angeles, CA 90017
Telephone: (213) 443-3000

Deepa Acharya (admitted *pro hac vice*)
777 6th Street NW, 11th Floor
Washington, DC 20001
Telephone: (202) 538-8000

Attorneys for Defendant Ricoh Americas Corporation

CERTIFICATE OF SERVICE

I hereby certify that on April 7, 2016, I caused the foregoing Defendant's Amended Answer, Affirmative Defenses and Counterclaims to be filed with the United States District Court for the Eastern District of Pennsylvania via the Court's CM/ECF system, which will provide electronic notice to all counsel and parties of record.

/s/ *William T. Hangley*
William T. Hangley